BEFORE THE

PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2009-3-E

In the Matter of)	
Annual Review of Base Rates)	DIRECT TESTIMONY OF
for Fuel Costs for)	THOMAS C. GEER ADOPTING
Duke Energy Carolinas, LLC)	TESTIMONY AND EXHIBITS OF
)	DAVID C. CULP

1	O.	PLEASE STATE YOUR NAME	E. ADDRESS AND POSITION
-	×.		, in the second

- 2 A. My name is Thomas C. Geer. My business address is 526 South Church Street,
- 3 Charlotte, North Carolina. I am Vice President of Nuclear Engineering for Duke
- 4 Energy Carolinas, LLC ("Duke Energy Carolinas" or the "Company").

5 Q. WHAT ARE YOUR PRESENT RESPONSIBILITIES AT DUKE ENERGY

6 CAROLINAS?

- 7 A. As Vice President of Nuclear Engineering, I am responsible for core physics,
- 8 safety analysis, fuel mechanical & thermal hydraulic performance, dose analysis,
- 9 the mixed oxide ("MOX") fuel project, nuclear fuel purchasing, and spent fuel
- management for Oconee, McGuire, and Catawba nuclear stations.

11 Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND

12 **PROFESSIONAL EXPERIENCE.**

- 13 A. I graduated from Texas A&M University with Bachelor of Science and Master of
- Science degrees in Nuclear Engineering. I began my career at Duke Energy
- 15 Corporation (formerly Duke Power Company) in 1982 and have held a variety of
- technical and leadership roles with both Duke Energy Carolinas and Duke
- 17 Engineering and Services, Inc., including positions at McGuire and Catawba
- nuclear stations, the Yucca Mountain Project in Nevada, and the Hanford Tank
- 19 Farms near Richland, Washington. I assumed my current role in 2004. I am a
- 20 registered professional engineer in the states of North Carolina and South
- 21 Carolina.

22 Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE PUBLIC

23 SERVICE COMMISSION OF SOUTH CAROLINA ("COMMISSION")?

- 1 A. Yes. I previously testified before this Commission in Docket No. 2008-3-E.
- 2 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS
- 3 **PROCEEDING?**
- 4 A. The purpose of my testimony is to adopt the testimony and exhibits of David C.
- 5 Culp filed in this case on July 27, 2009, which explains Duke Energy Carolinas'
- 6 nuclear fuel procurement practices.
- 7 Q. HAVE YOU REVIEWED THE DIRECT TESTIMONY AND EXHIBITS
- 8 OF DAVID C. CULP THAT WERE FILED IN THIS PROCEEDING?
- 9 A. Yes.
- 10 Q. DO YOU AGREE WITH MR. CULP'S TESTIMONY AND EXHIBITS?
- 11 A. Yes, I do.
- 12 Q. DO YOU ADOPT MR. CULP'S TESTIMONY AND EXHIBITS AS YOUR
- 13 OWN FOR THIS PROCEEDING?
- 14 A. Yes.
- 15 Q. DOES THIS CONCLUDE YOUR PRE-FILED TESTIMONY?
- 16 A. Yes, it does.